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9      *Attorneys for Defendant*  
0      *Sheng Thao*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

4 UNITED STATES OF AMERICA,

Case No. 25-CR-0003-YGR (KAW)

**Plaintiff**

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## **STIPULATION TO MODIFY CONDITIONS OF RELEASE**

and

## [PROPOSED] ORDER

Defendant

Defendant Sheng Thao and the United States, by and through their counsel of record, hereby stipulate as follows

1. Sheng Thao made her initial appearance before the Court on January 17, 2025. The Court entered an order setting an unsecured bond in the amount of \$50,000 and set conditions of release (including, in relevant part, a no-travel restriction outside of the Northern and Eastern Districts of California). See Dkt. No. 14.

2. The parties agree on the following conditions-of-release modification: Ms. Thao will be permitted to travel to the Central District of California during the period of November 13, 2025, through November 19, 2025, in order for Ms. Thao to visit her sister.

3. Pretrial Services Officer Jessica Portillo has no objection to the stipulated location/travel modification of Ms. Thao's conditions of release.

## IT IS SO STIPULATED.

Dated: October 9, 2025

DLA PIPER LLP (US)

By: /s/ Jeffrey E. Tsai  
JEFFREY E. TSAI

*Attorneys for Defendant  
SHENG THAO*

Dated: October 9, 2025

CRAIG H. MISSAKIAN  
United States Attorney

By: /s/ Abraham Fine  
ABRAHAM FINE  
MOLLY K. PRIEDEMAN  
LLOYD FARNHAM

### *Assistant United States Attorneys*

## **[PROPOSED] ORDER**

Pursuant to the stipulation of the parties, Defendant Sheng Thao's conditions of release are modified as follows:

Ms. Thao is permitted to travel to/from the Central District of California during the period of November 13, 2025, through November 19, 2025, in order for Ms. Thao to visit her sister.

IT IS SO ORDERED.

Dated:

THE HON. KANDIS A. WESTMORE  
UNITED STATES MAGISTRATE JUDGE